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Attorneys for Defendants  
P. Gill Obstetrics & Gynecology Medical Group, Inc.;  
Parampal K. Gill, M.D.; Jasbir S. Gill, M.D.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA AND STATE  
OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

Plaintiff,

v.

P. GILL OBSTETRICS & GYNECOLOGY  
MEDICAL GROUP, INC., a California  
professional corporation; PARAMPAL K. GILL,  
M.D., an individual; JASBIR S. GILL, M.D., an  
individual,

Defendants.

Case No. 2:21-cv-0554-KJM-AC

STIPULATION EXTENDING  
DEFENDANTS' DEADLINE TO  
RESPOND TO COMPLAINT; ORDER

1 This stipulation (“Stipulation”) is entered into by and among Relator GAIL JOSEPH, M.D.  
2 and Defendants P. GILL OBSTETRICS & GYNECOLOGY MEDICAL GROUP, INC.;  
3 PARAMPAL K. GILL, M.D.; JASBIR S. GILL, M.D. (jointly, “Defendants”) (collectively  
4 “Parties”), through their respective counsel.

5 Recitals

6 1. By entering into this Stipulation, neither Relator nor Defendants waive or concede  
7 any right not specifically addressed herein.

8 2. The original date for Defendants to file a response to the Complaint was February 1,  
9 2022.

10 3. The Parties agreed to an initial stipulation extending Defendants’ time to respond to  
11 March 3, 2022, pursuant to Local Rule 144.

12 4. On March 2, 2022, out of professional courtesy and in light of Defendants’ retention  
13 of new counsel, the Parties stipulated to extend Defendants’ time to respond to the Complaint to  
14 April 4, 2022, and to continue the Status (Pretrial Scheduling) Conference. On March 14, 2022,  
15 the Court entered the order on the stipulation (ECF No. 16).

16 5. The Court’s order (ECF No. 16) set Defendants’ deadline to respond to the  
17 Complaint on or before April 4, 2022, and the Status (Pretrial Scheduling) Conference for May 5,  
18 2022.

19 6. The discovery cutoff date, last date for hearing motions, pretrial conference date,  
20 and trial date have not yet been set.

21 7. Defendants’ counsel has had an opportunity to start investigating the facts in the  
22 Complaint. On March 30, 2022, the Parties discussed the case via Zoom video and decided that  
23 early resolution efforts should be pursued to avoid the potentially unnecessary fees and costs that  
24 would be incurred in litigation. On the March 30, 2022, Zoom conference, the Parties agreed to  
25 take the following, specific resolution steps:

26 a. Exchange certain information pursuant to Federal Rule of Evidence 408 on  
27 Friday, April 8, 2022. In particular, Defendants intend to voluntarily provide information to assist  
28 Relator to value her claims and Relator intends to provide information that assist Defendants to

1 understand her claims, including caselaw, information about her wage and hour claim, and other  
2 information that informs the value of her other claims.

3 b. The Parties agreed that following the exchange of information protected by  
4 Federal Rule of Evidence 408 on April 8, 2022, the Parties will use the following week to evaluate  
5 the information provided by the other Party to determine whether early resolution efforts should  
6 continue to be pursued, and if so, what further actions should be taken.

7 8. During the March 30, 2022, Zoom conference, the Parties agreed that to facilitate  
8 the specific resolution steps outlined in Paragraph 7 above, that Defendants' responsive deadline  
9 should be extended 11 calendar days, from April 4, 2022 to April 15, 2022.

10 THEREFORE:

11 **IT IS STIPULATED:**

12 1. The current deadline of April 4, 2022, for Defendants to respond to Relator's  
13 Complaint is extended 11 days and a response shall be filed by or on April 15, 2022.

14  
15 Dated: March 31, 2022

STOEL RIVES LLP

16 By: /s/ Nicholas D. Karkazis  
17 MATTHEW D. SEGAL  
18 NICHOLAS D. KARKAZIS  
19 Attorneys for Defendants  
20 P. Gill Obstetrics & Gynecology Medical  
Group, Inc.; Parampal K. Gill, M.D.;  
Jasbir S. Gill, M.D.

21 Dated: March 31, 2022

THE BRINEGAR LAW FIRM

22 By: /s/ Matthew Brinegar  
23 MATTHEW BRINEGAR  
24 Attorneys for Relator/Plaintiff  
25 Gail Joseph, M.D.  
26  
27  
28

**ORDER**

The Court has reviewed the forgoing Stipulation, and good cause appearing, hereby  
**ORDERS:**

1. The current deadline of April 4, 2022, for Defendants to respond to Relator's  
Complaint is extended 11 days. Defendants shall respond on or before April 15, 2022.

DATED: April 5, 2022.

  
CHIEF UNITED STATES DISTRICT JUDGE